

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA

In re: Andrew Koteles

Andrew Koteles,
Movant,

v.

Pennsylvania Department of Revenue, Steve
and Linda Levandowsky, Internal Revenue
Service, and Ronda J. Winnecour, Chapter 13
Trustee,
Respondents

Bankruptcy No. 17-23972-JAD

Chapter 13

Docket Document No. 153
Related to DD No. 148

STIPULATION AUTHORIZING SALE OF PROPERTY WITHOUT PUBLICATION

AND NOW Debtor Andrew Koteles and Chapter 13 Trustee Ronda J. Winnecour, through their respective counsel, file the following stipulation concerning the pending Motion to Sell Real Property:

1. This stipulation relates to the Motion to Sell Real Property Free and Clear of Liens filed by the Debtor at docket document no. 148.
2. More specifically, the Debtor seeks to sell all of his rights in the real property located at 6231 Route 88, Union Township, Washington, PA 15332 (hereinafter the "Real Property"), as well as certain equipment therein (hereinafter the "Shop Equipment").
3. After review of the proposed sale price, all liens on the property, and the complete pool of unsecured creditors, the Debtor and the Chapter 13 Trustee agree that the net proceeds to be provided to the Trustee as part of the sale are sufficient to pay a 100% dividend to all priority and unsecured creditors who have filed valid claims.

4. To that end, pursuant to W.Pa.L.B.R. 6004-2, the Debtor and the chapter 13 Trustee hereby stipulate that the pending sale Motion does not require publication as otherwise would be necessary under W.Pa.L.B.R. 6004-1.

WHEREFORE, the Debtor and the Chapter 13 Trustee so stipulate.

Respectfully submitted,

Date: January 3, 2022

/s/Justin P. Schantz
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